

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendants.

Case No. 2:22-cv-00422-JRG-RSP

**JURY DEMANDED**

**PLAINTIFF HEADWATER RESEARCH LLC'S  
UNOPPOSED MOTION TO EXTEND RESPONSE DEADLINE**

Plaintiff Headwater Research, LLC (“Headwater”) respectfully requests to extend the deadline to respond to Samsung’s Motion to Compel Production of Documents Withheld Under Improper Assertions of Privilege, Work Product, and Common Interest and for Headwater to Cure its Deficient Privilege Log (Dkt. 100) (the “Motion”) by one day.

Samsung filed its Motion on February 13, 2024. Headwater’s response to the Motion is due on February 27, 2024. *See* Local CV-7(e). Headwater seeks a one-day extension to its deadline to respond to the Motion, which would move the deadline from February 27, 2024 to February 28, 2024.

Good cause exists to modify Headwater’s response deadline because counsel for Headwater involved in preparing its response to the Motion are also involved in preparing for the taking of multiple depositions of Samsung witnesses this week. Samsung does not oppose this request. The requested extension is not sought for the purpose of delay and will not require extension of any other deadlines.

Dated: February 27, 2024

Respectfully submitted,

/s/ Marc Fenster

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**ATTORNEYS FOR PLAINTIFF,  
Headwater Research LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 27th day of February 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster  
Marc Fenster

**CERTIFICATE OF CONFERENCE OF COUNSEL**

I hereby certify that counsel of record for Headwater and Samsung have met and conferred in compliance with Local CV-7(h). Samsung does not oppose this motion.

/s/ Marc Fenster  
Marc Fenster